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*New York Hotel and Motel Trades Council, AFL-CIO*

Barry N. Saltzman  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

IRINA MORDUKHAYEV,

Plaintiff,

– against –

HILTON TIMES SQUARE, SUNSTONE HOTEL PROPERTIES INVESTORS, INC., HILTON HOTELS CORPORATION, FC42 HOTEL LLC, SUNSTONE 42<sup>ND</sup> STREET LLC, SUNSTONE 42<sup>ND</sup> STREET LESSEE, INC., SUNSTONE HOTEL PROPERTIES, INC. D/B/A HILTON TIMES SQUARE, SUNSTONE HOTEL OP, SECURE WATCH24 D/B/A SW24, SLAVKA KMEE, FOSTER BURNETT, ROCCO CASTELLANO, AND NEW YORK HOTEL AND MOTEL TRADES COUNCIL, AFL-CIO (Union),

Defendants.

Case No. CV-11-615 (ENV)(CLP)

**NOTICE OF MOTION OF THE  
NEW YORK HOTEL AND  
MOTEL TRADES COUNCIL,  
AFL-CIO (UNION) FOR  
JUDGMENT ON THE  
PLEADINGS PURSUANT  
TO Fed. R. Civ. P. 12(c)**

(Served 3/18/11)

PLEASE TAKE NOTICE that, upon the pleadings as attached to the accompanying Certification of Barry N. Saltzman, dated March 18, 2011, the accompanying memorandum of law dated March 18, 2011, and all prior proceedings had heretofore herein, defendant, NEW YORK HOTEL AND MOTEL TRADES COUNCIL, AFL-CIO (“Union”), will move before the Honorable Eric N. Vitaliano, U.S.D.J., at the United States Courthouse, for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201 for judgment on the

pleadings pursuant to Fed. R. Civ. P. 12(c), dismissing plaintiff's claims against the Union in their entirety and with prejudice, and granting such further relief as the Court may deem just and proper. Oral argument will be on a date and time to be designated by the Court.

Dated: New York New York  
March 18, 2011

Respectfully submitted,

PITTA & GIBLIN, LLP  
*Attorneys for Defendant*  
*New York Hotel and Motel Trades Council,*  
*AFL-CIO*

By:



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